

**EXHIBIT
A**

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

DR. STELLA IMMANUEL,

§

Plaintiffs,

§

v.

§ CIVIL ACTION NO. 4:21-CV-00587

ANDERSON COOPER

§

-and-

§

CABLE NEWS NETWORK, INC.

§

Defendants.

**DECLARATION OF KATHERINE M. BOLGER IN SUPPORT OF MOTION OF
DEFENDANTS CABLE NEWS NETWORK'S
MOTION TO DISMISS FOR FAILURE TO STATE A CLAIM**

I, Katherine M. Bolger, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a partner at the law firm of Davis Wright Tremaine LLP, attorneys for Defendant Cable News Network ("CNN" or "Defendant") in the above-captioned matter.
2. I submit this declaration to annex documents relevant to CNN's motion to dismiss plaintiff Dr. Stella Immanuel's ("Dr. Immanuel") Complaint under Rule 12(b)(6) in this action.
3. Annexed hereto as Exhibit A-1 is a true and correct copy of a video of a sermon given by Dr. Immanuel, titled "Deliverance From Spirit Husbands and Spirit Wives (Incubus and Succubus) Part one." The video was posted by Dr. Immanuel to her YouTube channel, *see Compl. ¶ 9*, and is available at <https://www.youtube.com/watch?v=CJrJG9xymts>.
4. Annexed hereto as Exhibit A-2 is a true and correct copy of a transcript of portions of a sermon given by Dr. Immanuel, titled "Deliverance From Spirit Husbands and Spirit Wives (Incubus and Succubus) Part one." A video of the sermon was posted by Dr. Immanuel to her

YouTube channel, *see* Compl. ¶ 9, and is available at

<https://www.youtube.com/watch?v=CJrJG9xymts>.

5. Annexed hereto as **Exhibit A-3** is a true and correct copy of a video of a sermon given by Dr. Immanuel, titled “Supreme Court legalizes gay marriage! A Fight For the Soul of America part two!” The video was posted by Dr. Immanuel to her YouTube channel, *see* Compl. ¶ 9, and is available at <https://www.youtube.com/watch?v=egzoTqwxMX8>.

6. Annexed hereto as **Exhibit A-4** is a true and correct copy of a transcript of portions of a sermon given by Dr. Immanuel, titled “Supreme Court legalizes gay marriage! A Fight For the Soul of America part two!” A video of the sermon posted by Dr. Immanuel to her YouTube channel, *see* Compl. ¶ 9, and is available at <https://www.youtube.com/watch?v=egzoTqwxMX8>.

7. Annexed hereto as **Exhibit A-5** is a true and correct copy of a video of a sermon given by Dr. Immanuel, titled “A Fight For The Soul Of America Is A Fight For The World.” The video was posted by Dr. Immanuel to her YouTube channel, *see* Compl. ¶ 9, and is available at https://www.youtube.com/watch?v=Mnu_h4gz-O4.

8. Annexed hereto as **Exhibit A-6** is a true and correct copy of a transcript of portions of a sermon given by Dr. Immanuel, titled “A Fight For The Soul Of America Is A Fight For The World.” A video of the sermon was posted by Dr. Immanuel to her YouTube channel, *see* Compl. ¶ 9, and is available at https://www.youtube.com/watch?v=Mnu_h4gz-O4.

9. Annexed hereto as **Exhibit A-7** is a true and correct copy of a screenshot that I took on December 8, 2021, of the “About” page for Dr. Immanuel’s YouTube channel, which Dr. Immanuel references in her Complaint. *See* Compl. ¶ 9. The “About” page is available at <https://www.youtube.com/user/firpowerministries/about>.

10. Annexed hereto as **Exhibit A-8** is a true and correct copy of a CNN telecast titled “Trump walks out of briefing after CNN question,” which aired on July 28, 2020 as part of the news program Situation Room. Dr. Immanuel bases her claims partly on portions of this telecast. *See* Compl. ¶ 5.a.

11. Annexed hereto as **Exhibit A-9** is a true and correct copy of a CNN telecast titled “Meet the New Boss. Same as the Old Boss,” which aired on July 28, 2020 as part of the news program Anderson Cooper 360°. Dr. Immanuel bases her claims partly on portions of this telecast. *See* Compl. ¶ 5.b.

12. Annexed hereto as **Exhibit A-10** is a true and correct copy of a CNN telecast titled “A ‘Wartime President.’ More Than 100,000 Lives Lost,” which aired on July 29, 2020 as part of the news program Anderson Cooper 360°. Dr. Immanuel bases her claims partly on portions of this telecast. *See* Compl. ¶ 5.g.

13. Annexed hereto as **Exhibit A-11** is a true and correct copy of a screenshot I took on December 8, 2021, of the landing page for the CNN telecast “Meet the New Boss. Same as the Old Boss.” Dr. Immanuel bases her claims partly on portions of the text appearing on the right-hand side of the landing page. *See* Compl. ¶ 5.d. The landing page is available at <https://www.cnn.com/videos/politics/2020/07/29/donald-trump-coronavirus-doctor-kth-sot-vpx-ac360.cnn>.

14. Annexed hereto as **Exhibit A-12** is true and correct copy of a Tweet by @AC360 posted on July 28, 2020, promoting the CNN telecast “Meet the New Boss. Same as the Old Boss.” Dr. Immanuel bases her claims partly on this Tweet. *See* Compl. ¶ 5.f. The Tweet is available at <https://twitter.com/AC360/status/1288266710697619459>.

15. Annexed hereto as **Exhibit A-13** is true and correct copy of a Tweet by @CNN posted on July 28, 2020, promoting the CNN telecast “Meet the New Boss. Same as the Old Boss.” Dr. Immanuel bases her claims partly on this Tweet. *See Compl. ¶ 5.f.* The Tweet is available at <https://twitter.com/CNN/status/1288276149118709760>.

16. Annexed hereto as **Exhibit A-14** is a true and correct copy of an article titled *Trump promotes a doctor who has claimed alien DNA was used in medical treatments*, CNN Politics (July 29, 2020). Dr. Immanuel bases her claims partly on portions of this article. *See Compl. ¶ 5.c.* The article is available at <https://www.cnn.com/2020/07/29/politics/stella-immanuel-trump-doctor/index.html>.

17. Annexed hereto as **Exhibit A-15** is a true and correct copy of an article titled *Social media giants remove viral video with false coronavirus claims that Trump retweeted*, CNN Business (July 28, 2020). Dr. Immanuel bases her claims partly on portions of this article. *See Compl. ¶ 5.e.* The article is available at <https://www.cnn.com/2020/07/28/tech/facebook-youtube-coronavirus/index.html>.

18. Annexed hereto as **Exhibit A-16** is a true and correct copy of an article titled *Some doctors met with Pence after their group's video was removed for misleading info*, CNN Politics (July 29, 2020). Dr. Immanuel bases her claims partly on portions of this article. *See Compl. ¶ 5.h.* The article is available at <https://www.cnn.com/2020/07/29/politics/mike-pence-doctors-misinformation/index.html>.

19. Annexed hereto as **Exhibit A-17** is true and correct copy of a retraction request sent by counsel for Dr. Immanuel to CNN on July 1, 2021.

20. Annexed hereto as **Exhibit A-18** is a true and correct copy of a screenshot I took on December 13, 2021, of the YouTube landing page for a video of a sermon given by Dr.

Immanuel, titled “Deliverance From Spirit Husbands and Spirit Wives (Incubus and Succubus) Part one.” See Compl. ¶ 9. The landing page is available at

<https://www.youtube.com/watch?v=CJrJG9xymts>.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
December 17, 2021

/s/ Katherine M. Bolger
KATHERINE M. BOLGER